



ABICF
1.6
1-5-93

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

January 5, 1993

CERTIFIED MAIL

Mr. Mike Buckland
Ace Galvanizing, Incorporated
429 South 96th Street
Seattle, WA 98108

Dear Mr. Buckland:

Re: Warning Letter

USEPA SF



1410068

This letter is to follow-up on our inspection of your facility on November 17, 1992. During that inspection we found several problems that should be corrected.

The facility uses an 800 - 900-gallon above-ground storage tank to store used waste oil that is generated from equipment maintenance activities. The tank needs to be stored in a manner to prevent any spills or leaks from getting to the storm drain. I have enclosed a copy of the City of Seattle's Best Management Practice 1.50 for your information. In it is a description of methods for preventing contamination from reaching the storm drain such as housing the tank within a impermeable berm. The volume of the bermed area must be 110 percent of the capacity of the largest container. In addition, the storage area should be covered to prevent rainwater from coming in contact with the storage materials.

Adjacent to the area where you store three 55-gallon drums of hydraulic oil, motor oil and solvent was a fourth drum containing transmission fluid. This drum needs to be stored within the bermed enclosure. Transmission fluid permitted to leak to the ground without secondary containment could be washed to the storm drain in violation of water quality laws; specifically, Chapter 90.48.080. Dross and two batteries were stored on the paved lot next to the large recirculating tanks. Acid from the batteries and material that could leach off the dross could be flushed to the storm drain in a rain event. Batteries and dross should be stored to prevent rainwater from coming in contact with these materials. BMP 1.60 is enclosed for your information.

Because you have made significant effort to correct the problems at your facility, I propose the following schedule in lieu of formal enforcement at this time:

1. Within 10 calendar days of receiving this letter, Ace Galvanizing will indicate to the Department of Ecology, in writing, that it voluntarily intends to address and eliminate all water quality violations. Upon receipt, Ecology will stay the initiation of formal enforcement proceedings as long as Ace Galvanizing makes a good-faith effort to correct the problem areas and violations.

Mr. Mike Buckland

Page 2

January 5, 1992

2. Within 30 calendar days of receiving this letter, Ace Galvanizing will develop a plan and schedule for addressing the lack of proper containment for the tank. In addition, Ace Galvanizing will submit a statement on the status of the battery and dross storage conditions.

In the event that any of the above elements cannot be addressed by Ace Galvanizing within the schedule, you must provide, in writing, the reason for the delay and a proposed completion date. Failure to do so will result in initiation of formal enforcement action, including monetary penalties.

All corrective actions are subject to on-site verification by the Department. Verification inspections will not be announced in advance.

If you have any questions, please call me at (206) 649-7208.

Sincerely,

Martha Turvey
Martha Turvey, Inspector
Elliott Bay Action Team

MT:rs

Enclosures: 1. BMP 1.50
2. BMP 1.60

cc: Joanne Polayes-Wien, Ecology, EBAT
Mike Gallagher, Ecology, TCP
Tom Hubbard, King Co., SWM